

**BRAFMAN & ASSOCIATES, P.C.**

ATTORNEYS AT LAW

256 FIFTH AVENUE, 2ND FLOOR

NEW YORK, NEW YORK 10001

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER  
OF COUNSEL

MARC A. AGNIFILO  
OF COUNSEL

ZACH INTRATER  
OF COUNSEL

ANDREA L. ZELLAN

JACOB KAPLAN

TENY R. GERAGOS  
ADMITTED IN NY & CA

STUART GOLD

January 20, 2021

Honorable George B. Daniels  
U.S. District Court for the S.D.N.Y.  
500 Pearl Street  
New York, NY 10007

Re: United States v. Zilberberg, 19 Cr. 802 (GBD)

Dear Judge Daniels:

We represent Mendel Zilberberg in the above-referenced case. On January 4, 2021, this Court granted counsel's request to modify the motion schedule in the above-referenced case as follows: January 25, 2021–Defense Motions Due; February 12, 2021–Government Opposition Due; February 26, 2021–Defense Reply Due. We continue to discuss the potential severance motion issues with the Government in the hopes of resolving disagreements without the need for motions. In order to continue these discussions, we respectfully request—without objection from the Government or counsel for codefendant Aron Fried—that the Court modify the motion schedule as follows:

- February 15, 2021 – Defense Motions Due
- March 5, 2021 – Government Opposition Due
- March 19, 2021 – Defense Reply Due

This is counsel's third extension request. Thank you for your consideration.

Respectfully,



Benjamin Brafman, Esq.

cc: Gov't Counsel (via ECF)